

EXHIBIT A

Menaldo, Nicola C. (SEA)

From: Menaldo, Nicola C. (SEA)
Sent: Monday, May 11, 2020 4:43 PM
To: 'Todd Logan'
Cc: 'Rafey Balabanian'; 'Brandt Silver-Korn'; 'Cecily Shiel'; 'Austin Prather'; O'Sullivan, Kathleen M. (SEA); Martin, David (SEA)
Subject: RE: Fife v. Scientific Games - Deposition Notice
Attachments: Fife Depo Notice.pdf

Hi Todd,

We understand from your email from earlier today that you will be providing responses to this and other correspondence tomorrow afternoon or Wednesday morning. Thank you for that update. In the meantime, I am attaching here a placeholder notice of deposition that we can supplement, if needed, once we iron out details.

Thanks,
Nicola

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From: Menaldo, Nicola C. (SEA)
Sent: Thursday, May 07, 2020 5:31 PM
To: 'Todd Logan' <tlogan@edelson.com>
Cc: Rafey Balabanian <rbalabanian@edelson.com>; Brandt Silver-Korn <bsilverkorn@edelson.com>; Cecily Shiel <cshiel@tousley.com>; Austin Prather <aprather@edelson.com>; O'Sullivan, Kathleen M. (SEA) <KOSullivan@perkinscoie.com>; Martin, David (SEA) <DMartin@perkinscoie.com>
Subject: Fife v. Scientific Games - Deposition Notice

Todd,

Scientific Games intends to notice the deposition of Plaintiff Sheryl Fife. We would like to work with you in terms of a date on which you and your client are available. To be clear what I mean by "available," we are not contemplating an in-person deposition, but one conducted remotely. For now, we simply intend to indicate a placeholder date of May 22. In light of current public health circumstances and Washington's stay-at-home order, will you agree to a remote deposition pursuant to Federal Rule of Civil Procedure 30(b)(4)?

Kindly provide your response no later than Monday, May 11 so that we can issue the notice without delay.

Thanks,
Nicola

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THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

SHERYL FIFE, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SCIENTIFIC GAMES CORP.,

Defendant.

No. 2:18-CV-0565-RBL

**DEFENDANT SCIENTIFIC GAMES'
NOTICE OF DEPOSITION OF
PLAINTIFF SHERYL FIFE**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, pursuant to Fed. R. Civ. P. 30, counsel for Defendant Scientific Games Corporation will take the oral and videotaped deposition of Plaintiff Sheryl Fife on May 22, 2020, commencing at 9:30 a.m., in Seattle, Washington. The deposition will continue until complete, and shall be recorded by videographic and stenographic means.

Counsel of record is invited to attend and examine.

Because of the COVID-19 pandemic, Scientific Games has requested that Plaintiff stipulate to a deposition taken by remote means using remote deposition technology. *See* Fed. R. Civ. P. 30(b)(4). Scientific Games will amend this notice of deposition, if needed, after receiving Plaintiff's response to that request.

1
2 DATED: May 11, 2020

s/ Kathleen M. O'Sullivan
Kathleen M. O'Sullivan, WSBA No. 27850
Nicola C. Menaldo, WSBA No. 44459
David T. Martin, WSBA No. 50160

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9 *Attorneys for Defendant*